Exhibit "B"



June 1, 2007

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## VIA FACSIMILE AND FIRST CLASS MAIL

Thomas J. Morrissey, Esq. 164 Strathmore Road, Suite 25 P.O. Box 1336 Brookline, MA 02446

Re:

Premier v. Penzell, et al.

Dear Tom:

My client has instructed me to move forward with the Florida depositions. A week ago, you wrote to me indicating that your client is interested in moving forward with discovery as well. I have replied to that correspondence and tried to call you to move the ball forward in this regard.

Please provide me with dates in late June or early July in which your expert is available to be deposed in Miami. I will in turn follow up with my people to get dates for the depositions of my expert, Beverly Penzell and the inventory attorneys. Please advise whether you wish to depose any or all of these individuals. I recommend that we use Jerald Freshman's office to conduct the depositions, as it is located in Miami, which is central to most of the witnesses. I make the recommendation without knowing the number of depositions we'll need to conduct or the dates on which we'll be conducting them. However, I will confirm with Mr. Freshman that in general terms, this would work. If this suggestion is not acceptable, please let me know so we can make alternative arrangements.

I would like to move forward on this matter expeditiously, in this regard, let's plan on speaking mid-week next week, to see where we are at in obtaining dates. Thank you for your immediate attention to this matter.

Very truly yours,

cc: Steven A. Sussman, Esq.

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